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March 23, 1999

Mr. Michael McAteer
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Re: **Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)**
• **EPA March 19, 1999 response to and disapproval of February 22 SSP submittal**
• **Issues requiring early decision in preparation of the April 9th SSP submittal**

Mr. McAteer,

As you have proposed, and to optimize the acceptability of the next SSP submittal, Solutia has done a preliminary review of the Agency's March 19, 1999 response and rejection of the February 22, 1999 submittal of the SSP. We have prepared a list of questions and decisions / clarifications we feel need to be addressed early, preliminary to Solutia's next submittal of the SSP, required by April 9, 1999. Solutia's objective is to submit an "approvable SSP" on April 9.

As a general but important comment, the EECA / RIFS SSP is continuing to grow in scope, cost and time to implement with each review step. The EECA SSP has moved toward RIFS stature, losing the Agency's initial characterization of fast and focused. Although we have not yet completed development of the schedule for the current EECA scope of work, our consultants do not believe that the currently defined scope can be completed in the calendar year 1999, contrary to the Agency's earlier stated objective. If this is not acceptable to the Agency, we need to discuss alternatives now for moving forward in a different manner.

Other more specific comments are attached. We appreciate your agreement to address these issues early in a united effort to deliver the best SSP document possible by the April 9 deadline.

Sincerely,

A handwritten signature in dark ink, appearing to read "D. M. Light", is written over the typed name.

D. M. Light
Manager, Remedial Projects
Solutia Inc.

cc:

Bruce Yare - Solutia

General

Solutia is having difficulties with the number of commenters and the sometimes contradictory requests by those multiple commenters on the same material. Should all of the Agency's contractors be commenting on the same material? It is Solutia's understanding that the USACE is the Agency's oversight contractor and that Weston is the Agency's risk assessment contractor. Yet Weston is providing comments on all portions of the Support Sampling Plan. This duplication of effort does not seem appropriate and in some cases puts Solutia in a position of having to resolve conflicting positions. Even the Corps does not speak with one voice; two sets of comments are given on the same document.

Giving Solutia comments from a number of separate sources, all commenting on the same material without consolidating the comments puts Solutia at a disadvantage in preparing an "approvable plan". Solutia is required to sort through all the comments, interpret what they mean, resolve conflicting or ambiguous comments and incorporate all of them into a response that is due in 21 days after receipt of the comments. A considerable amount of time must be expended consolidating these comments and turning them into actionable items that can be incorporated in the SSP.

Nevertheless, Solutia's objective is to give the Agency (USEPA) an "approvable plan" by April 9. Solutia intends to do its best to address Agency concerns and meet Agency expectations. However, as the detailed and specific issues below illustrate - because of unclear, conflicting or impossible to address comments by the Agency's contractors - some preliminary clarification and decisions by the Agency are required before Solutia has a fair chance to meet that objective. Solutia is asking the Agency to provide early clarification on the specific issues delineated below so that we can prepare an "approvable" document in its April 9, 1999 submittal of the SSP, FSP, QAPP and HASP.

USEPA General Comments on February 22, 1999 Support Sampling Plan

4. Sign-Off Sheets - Sampling location sign-off sheets were included in the SSP to document that agreement was reached in the field on sampling station locations that can not be specified in advance of conducting the work. In addition, some procedure is needed to record field changes requested by the Agency and/or by Solutia. Field decisions need to be documented and the Agency's concurrence with the decision needs to be obtained in a timely manner so that Solutia can perform the work without incurring standby charges for idle personnel and equipment.

Field change orders have worked well at other Superfund sites where Solutia is the managing PRP. Solutia is open to another method acceptable to the Agency for documenting field decisions that select or change sampling locations or any other changes that need to be made as a result of conditions encountered in the field.

What alternative does the Agency propose to handle this issue?

USEPA Comments on Solutia's February 22, 1999 Response to Comments

1. Response to USEPA Comment 1 and 2 - Solutia understands its responsibility under the AOC to select, and justify the selection, of sampling points. Since the AOC was very specific in identifying data gaps, Solutia believed that the Agency had enough knowledge of site conditions, through the past site characterization work reported by Ecology and Environment in 1988 and review of the 1998 Ecology and Environment data summary report, to have specific sampling locations in mind when preparing the AOC/SOW or it had enough knowledge of the site to suggest specific locations.

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It was Solutia's intent in allowing the Agency to specify the sampling point to take advantage of the Agency's knowledge of the site and to indicate that Solutia would defer to the Agency over sampling point location if the Agency preferred another location than the one selected by Solutia.

It remains our intent to locate the "center sampling point" in the deepest portion of each fill area using aerial photographs to identify these areas. If the Agency disagrees with this approach, Solutia would like to know it now so that the Agency's preferred approach can be written into the SSP.

2. **Response to USACE Comment 3** - Solutia did not, and still does not, understand the need to identify whether or not listed wastes were placed in the fill areas - an evaluation requested by USACE. Its comments about the need to incinerate listed wastes are based on its understanding of RCRA regulations. The comment on presumptive remedies for mixed municipal/industrial waste landfills are based on observation of actions taken by the Agency at a number of such Superfund facilities across the country. Regardless of these comments, Solutia intends to undertake a result neutral investigation that will thoroughly, and equally, evaluate "a variety of remedial/removal options for the Site without prejudice to any remediation technologies." Solutia has tried to consistently demonstrate to the Agency that we intend to work cooperatively. The most obvious fact demonstrating this commitment is that Solutia is the only PRP signatory to the AOC/SOW for the site while twenty five others chose a path of non-cooperation.

Solutia requests clarification of the listed waste issue by the Agency and what needs to be done to address this issue.

USACE's Comments on Solutia's February 22, 1999 Response to Agency Comments

1. **Page 4, USEPA Specific Comment 4** - It is unclear what the USACE means when it states "Modify the plan to include Site M". Groundwater sampling is being done at Site M. Shallow groundwater is being sampled at the end of Walnut Street immediately adjacent to Site M in order to determine if impacted groundwater exists at this location. If impacted groundwater is present, it could migrate toward the domestic wells used for lawn and garden watering. This data will provide information as to whether or not Site M is acting as a source impacting groundwater quality.

How is Solutia's plan deficient?

Page 8, USEPA Specific Comment 10 - Solutia defers to the USACE's interpretation of RCRA regulations concerning disposal of dioxins from sources other than listed wastes. Solutia is aware of only one facility that will incinerate dioxin-containing solids, i.e. SafetyKleen in Coffeyville, Kansas. If the Corps knows of another facility that will incinerate dioxin-containing solids with concentrations of up to 50 ppm, Solutia will add them to the list of treatability study contractors to be evaluated for performance of the incineration pilot test required by the AOC/SOW.

Input from the Corps on other incineration contractors permitted to burn dioxin-containing solids would be appreciated.

Page 9, USEPA Specific Comment 12 - Solutia will do its best to describe the rationale for selecting sampling locations so that it can be used to guide field decisions. Even with this description, the Agency and Solutia will need to select original and/or change approved locations in the field. Some procedure is needed to record these selections and changes. Other changes will likely occur during the course of the field work. Some procedure is needed for dealing with these changes.

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Field change orders have worked well at other Superfund sites where Solutia is the managing PRP. Solutia is open to another method acceptable to the Agency for documenting field decisions that select or change sampling locations or any other changes that need to be made as a result of conditions encountered in the field.

Sign off by the Agency on the selected locations clearly causes some concern for reasons not apparent to Solutia. Change management is an issue that needs to be addressed and Solutia is open to the Agency's suggestions. Dealing with the process of change management during the investigation will result in unnecessary delays. Dealing with it now is a good idea and will facilitate the site investigation process.

Solutia would appreciate the Agency's thoughts on how to manage the changes that inevitably occur when conducting site investigations.

Page 10, USACE Specific Comment 1 and Page 10, USACE Specific Comment 2 - Solutia understands these comments to require review of 104E submittals, 103C documents and "other pertinent information" before finalizing the analytical parameter list and to include a historical analysis of these documents in the Support Sampling Plan.

The AOC/SOW (Page 3, Section B) specifies that the Support Sampling Plan shall include an activity "characterizing the waste materials at the Site. This shall include an analysis of current information/data on past disposal practices at the Site". Solutia will revise the SSP to include this review as an up-front task to be performed in advance of field work. Chemical lists will be compiled for both the fill areas and Dead Creek.

It would be helpful in determining the duration of this review if the Agency could provide an estimate of the volume of documents that need to be reviewed. Without this knowledge, Solutia will need to be conservative in estimating the time required to complete this work.

As to providing a historical section in the Support Sampling Plan based on review of "104E, 103C and other pertinent information" as required by the Corps' comment, this is not required by the AOC to be part of the Support Sampling Plan but rather is required as a deliverable resulting from implementation of the SSP once approved. Expecting Solutia to conduct this analysis during in the 21 day SSP revision period specified by the AOC is unreasonable.

Solutia would appreciate clarification from the Agency whether it concurs that this activity is necessary? Solutia believes that this work could take up to 90(?) days to complete and cannot be completed prior to the April 9 submittal date.

Page 11, USACE Specific Comment 3 - Monsanto/Solutia has disclosed information on Site R as well as Sauget Area 1 in response to Agency requests for information. Monsanto has better records for Site R than for Sauget Area 1 because it was the operator of this facility. Monsanto was not the operator of the fill areas in Sauget Area 1.

The declaration requested by the Corps, specifically "Solutia should declare either no other dioxin containing waste was disposed of in Sauget Area One [sic] sites or identify those additional impacted areas" presumes that Solutia has the knowledge to make such a declaration which it doesn't. On the contrary, since dioxin is present in at least Site G according to analyses reported by the Agency in the AOC Findings of Fact, Solutia can not make a declaration that "no other dioxin containing waste was disposed of in Sauget Area One [sic] sites nor can it "identify those additional impacted areas".

It is unlikely that records will be sufficient to determine whether or not the dioxin present in Sauget Area 1 is from a RCRA listed process. However, if documentary evidence from "104E, 103C and other

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pertinent information" does indicate the dioxin in Sauget Area 1 is from a listed source, this information will be included in the work product from the historical document review.

Does the Agency consider this an adequate resolution of this issue?

Page 12, USACE Comment 4 - Solutia is still confused by this comment. When the historical analysis is done, the list of chemicals in the fill areas and the creek are compiled and the analytical parameter list is finalized, what else is there to do "in the event compounds, possibly different from previous reports, are identified in significant quantities."

Additional clarification of Agency expectations would be appreciated if this comment is not resolved by the up-front historical review of "104E, 103C and other pertinent information" and compilation of a list of chemicals present in the fill areas and Dead Creek.

If this issue is addressed by the historical review of "104E, 103C and other pertinent information" and compilation of a chemicals list for the fill areas and Dead Creek, Solutia would appreciate confirmation that it does so in order to facilitate submission of an "an approvable Support Sampling Plan".

Page 15, USACE Specific Comment 10 - Leachable organics and metals are not the analyses proposed for Site N. Waste characterization analyses at Site N include sample analysis for RCRA Characteristics, VOCs, SVOCs, Metals, Mercury, Cyanide, PCBs, Pesticides, Herbicides and Dioxins (See Page 2, Section 3.1, Waste Characterization Sampling Plan, Waste Depths) of the February 22, 1999 SSP).

How should Solutia correct this apparent misunderstanding of the work to be performed at Site N?

USACE Comments on February 22, 1999 Support Sampling Plan

General - In response to a procedure Solutia included in the SSP to document Agency agreement with sampling locations, the Corps states "the signature does not constitute a determination as to the acceptability of the sampling activities nor lessen [the] obligation or responsibility Solutia may otherwise have under CERCLA".

As discussed above, some procedure is needed to document field agreements reached with the Agency. Solutia is unwilling to perform work at a location unless it is assured that both parties to the AOC agree that the location is appropriate at the time the work was conducted. Such an agreement on location, or on a change in scope, does not relieve Solutia of its obligations under the AOC to perform the work approved by the Agency. It is distressing to read that a simple documentation procedure attempting to ensure agreement on where samples are to be collected was construed as an attempt to shirk responsibilities Solutia assumed when it signed the AOC.

How does the Agency want to handle sample location approval in those situations where final locations need to be selected in the field?

How does the Agency want to handle scope or method changes where work can not be done as anticipated in approved plans?

Memorandum for CENWO-CD-FC (12 Mar 99)

6. Support Sampling Plan General - This comment requires that the SSP contain "reasonably accurate drawings showing proposed sampling locations". Solutia has authorized a contractor to obtain air photographs of the Site and prepare a topographic map of the study area in anticipation that such a map

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would be needed for preparing the SSP Data Report. This work is underway but will not be completed in time to include these maps in the SSP submittal on April 9, 1999.

Solutia is in a quandary as to how to address this requirement by the April 9, 1999 SSP submittal deadline. The site is over three miles long and the only published topographic map it is aware of is the USGS Cahokia, IL-MO quadrangle map which was used to prepare the sample location maps included in the SSP. Even if the aerial photography is taken in March, completion of the topo maps (a total of 17 30-inch by 40-inch drawings at a scale of 1 inch = 50 feet) can not be completed in time for inclusion in the SSP.

If the Corps has a base map at a smaller scale than the USGS quadrangle, Solutia is willing to use it to prepare drawings for inclusion in the SSP provided the map can be sent no later than April 5, 1999 in an electronic format that O'Brien & Gere's CAD system can read.

How does the Agency want Solutia to proceed when faced with a requirement that can not be met?

Weston Comments on Solutia's February 22, 1999 Response to Comments

Weston Specific Comment 2 - In response to the Agency's comment, Solutia included a reference location for use in the Ecological Risk Assessment. Surface water, sediment bioassay, benthic organisms, vegetation and fish were to be sampled at three locations in the reference area. Weston is requiring sampling soil, sediments, surface water, groundwater and biological tissue at the reference location.

Solutia admits that it erred in not including sediment sampling in the description of samples to be collected in the ecological reference area but it does not understand the need to collect soil and groundwater samples at this area.

Sediment sampling and analysis at the reference area will be added to SSP.

Solutia is requesting clarification from the Agency on the issue of soil and groundwater sampling at a reference location. Specifically, Solutia requests that the Agency clarify: 1) the purpose of collecting soil and groundwater samples in a reference area and 2) whether or not the soil and groundwater samples are to be collected at the ecological reference area.

Weston Specific Comment 5 - Solutia is being required to add total suspended solids and total dissolved solids analyses to each surface water sample. Solutia will add these analyses to the SSP but it requests that the Agency provide the purpose/objective for collecting this information so that this objective can be included in the SSP. Solutia is unwilling to speculate on the purpose for collecting this data and the comment provides no insight other than to indicate that TSS and TDS are "conventional parameters". In Solutia's experience, these parameters are not considered "conventional parameters" for surface water.

This is just one of several examples of comments where the Agency requires a change in the SSP yet does not provide a purpose/objective for the change. When Solutia incorporates the change into the SSP, without understand the Agency's reason for the change, it is then criticized for not explaining the purpose/objective of the data in the next round of comments. Comments of this nature, and the response Solutia is required to make, seems to be setting Solutia up to fail despite our efforts to accommodate the Agency. After warning Solutia that enforcement will be taken if an "approvable plan" is not submitted on April 9, 1999, Solutia is concerned that failure, and penalties, are preordained by some of the Agency's comments because no explanation is given for what we are required to do and our

submittal could subsequently be considered unsatisfactory because no reason is given for collecting the data.

How does the Agency want to handle this Catch 22 situation?

Weston Comments on February 22, 1999 Support Sampling Plan

4. "It seems particularly odd to eliminate VOCs from air sampling without justification and not to sample metals when metal refining operations existed in the area." Solutia was directed by USACE in their Specific Comment 223 (Page 17, Air Sampling Plan) as follows "Recommend streamlining air sampling effort to include four (4) PUF samples surrounding Site G and nine (9) PUF samples around all of Site One [sic] (perhaps three upwind and six downwind). Consideration for additional air monitoring would be made when results from Site One [sic] area Soil Gas Surveys and air monitoring are evaluated"

Solutia responded to this comment by incorporating the Corps requirement into the SSP. Now another comment is challenging this required change. Solutia can not resolve the issue of different approaches required by the Agency's contractors and looks to the Agency to provide a timely resolution. It is inherently unfair to require Solutia to change one submittal in response to one of its contractors comments and then change it again in response to another contractors comments. Solutia is required to hit a moving target, making it difficult, if not impossible, to submit an "approvable plan".

Weston Suggestions for the Solutia, Sauget and Cahokia, Illinois Support Sampling Plan

Comments Regarding Section 3.0 - Data Gap Description

2. "If a particular source area or creek segment will not be sampled during a particular task, (e.g. sediment sampling), rational for the omission must be presented." This is an impossible task. Not only does Solutia have to justify why it is collecting data - it has to justify why it is not collecting data. The reason given for this onerous requirement is that "One can not ascertain from the text if the omission was accidental, or if there is a reason for not sampling a particular area." This requirement is again setting Solutia up to fail and is grossly unfair.

Solutia will be submitting, as part of the revised SSP, a Human Health Risk Assessment Plan and an Ecological Risk Assessment Plan that will explain how the collected data will be used to perform these tasks. These plans do not discuss why data is not collected but rather why data is collected. The Agency's requirement to prove a negative, i.e. why data is not collected, can not be done in the 21 days Solutia has to revise the SSP nor can it be done given a longer time.

Solutia requests that the Agency clarify whether this comment is a "suggestion" or a "requirement". If it is a requirement, Solutia requests that the Agency provide guidance on the accepted procedure and format for demonstrating that data does not need to be collected.

Comments Regarding Section 3.2.6 - Ecological Assessment

"The sections reported in the *Ecological Risk Assessment Data Gaps* should be reordered as follows:

- Affected Ecosystem Description
- Assessment of Endpoint Organisms
- Exposure Pathways
- Toxicity Testing and Trapping
- Evaluation of Toxicity"

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Solutia followed the AOC/SOW in preparing the SSP and is now being directed to change the organization from that specified in a legally binding document to an organization preferred by the Agency's contractor.

Solutia is reluctant to change from the format specified in the AOC. While this change may provide clarity for the reviewer, it can create confusion because of the differences between the AOC and the SSP.

Solutia would like the Agency to expressly state that this change in organization vs. what was specified in the AOC is acceptable and is required while keeping in mind the confusion this change may create.

This comment also adds work that was never discussed with Solutia before, specifically an ecosystem assessment that includes "wetlands delineation, other special habitats present, indication of cover types and areal extent, lists of vegetation and fauna (terrestrial and aquatic); and a rare, threatened and endangered species search. Solutia thinks that a qualitative ecological assessment is appropriate to define habitat in a study area that is more than three miles long. Detailed mapping of wetlands, special habitats and cover types and extent does not seem to be in keeping with the Agency's expressed desire to conduct a quick, focused investigation of the site.

Solutia requests that the Agency clarify whether or not qualitative ecological assessments using site reconnaissance and published information are appropriate or if the detailed, site-specific mapping described by Weston is the required approach.

IEPA Comments on February 22, 1999 Support Sampling Plan

1. "The site background section should contain a statement or acknowledgment that past site data taken by Illinois and others is considered valid. This is very important in light of the fact that conclusions based on this data will be used to justify a remedy."

Requiring Solutia to validate data collected over a number of years by the IEPA and others in any time period, much less a 21 day period, is unreasonable and undoable. It is also unfair since IEPA knows full well that Solutia is challenging the HRS package prepared by IEPA. Using the forum of comments on the SSP as a backdoor method for removing one portion of Solutia's challenge of the HRS is inappropriate.

Solutia disagrees with this comment and requests the Agency clarify whether or not Solutia must validate previously collected data.

4. "One soil boring at the "center" of each site is not adequate to determine the maximum depth of contamination... Since the SSP "assumes" 40 feet below grade, is 40 feet the maximum depth Solutia is willing to go?"

Solutia is proposing to collect waste characterization samples at the deepest location in each fill area that can be identified from aerial photographs. It knows no better method for determining the vertical distribution of waste materials in the fill areas. Solutia also modified the SSP to include collection of waste samples every 10 ft. until the bottom of fill materials is encountered.

Solutia believes it has addressed these concerns already and requests clarification from the Agency as to why its proposed approach is unsatisfactory.

5. "Are four trenches adequate to define the boundaries of the landfills? A limited set of soil borings around the perimeter of each landfill should give a better indication of where the boundaries lie."

As stated in the SSP, Solutia plans to use historical and current aerial photographs to determine the areal extent of each fill area. Test trenches are proposed to confirm the boundaries determined by air photo analysis. Test trenches were agreed to by the Agency in past submittals and discussions and Solutia is baffled on how to respond to IEPA's statement that borings will better define the boundaries. The best definition of boundaries will come from the air photos; confirmation of the boundaries is best done with test trenches. Four trenches were proposed because each of the fill areas is roughly rectilinear and a trench on each side will confirm the boundaries identified through air photo analysis.

Solutia requests that the Agency provide clarification of how Solutia's approach is inadequate to define fill area boundaries.

6. "A credible waste volume at each site can not be determined using historical air photos and the depth of fill information from the "Waste Depths" section."

A conservative estimate of fill volume can be determined using maximum fill depth times the maximum areal extent.

Solutia fails to understand what is wrong with this approach and requests clarification from the Agency as to how its approach is inappropriate.

7. "The statement that Ecology & Environment (E&E) defined the areal extent of VOCs/SVOCs in shallow groundwater is not accurate"

Ecology & Environment included maps in their 1998 data summary report showing the areal distribution of VOCs and SVOCs in shallow groundwater at Sites G, H, I and L. Solutia's statement is accurate unless it is misreading the figures included in the 1998 E&E report.

Solutia requests that the Agency indicate how it is incorrectly reading the 1998 E&E report.

10. "Two samples will not define the nature and extent of groundwater contamination in the bedrock."

Solutia proposed two wells in bedrock at the location of the highest detected constituent concentrations in the overlying alluvial aquifer. These wells are designed to determine whether or not site-related constituents have penetrated into bedrock. Given the highly permeable nature of the American Bottoms aquifer, and the large amount of groundwater flowing through the alluvium and discharging to the Mississippi River, which is only a mile to the west of the study area, it is unlikely that COCs will enter bedrock which is more than 100 feet below grade. Two bedrock wells are considered sufficient to answer the question of whether or not site-related constituents are present in the bedrock. If they are present, additional characterization may be necessary.

Solutia understood its initial proposal to be acceptable to the Agency and requests clarification of what additional work is needed at this time to determine whether or not site-related constituents are present in bedrock.

11. "Section 3.2.3 should provide for potentiometric maps for shallow, intermediate and bedrock groundwater zones."

The Illinois Water Survey, Illinois Geological Survey and the US Geological Survey have extensively studied groundwater conditions in the American Bottoms aquifer. Based on these studies, there is little doubt that groundwater in this aquifer flows toward and discharges to the Mississippi River. Preparing site-specific potentiometric maps for shallow, intermediate and bedrock groundwater zones will not

significantly increase the knowledge base on flow patterns in the American Bottoms aquifer, however, it will significantly increase the amount of time needed to perform the SSP.

Solutia does not understand IEPA's unwillingness to take advantage of existing information when defining groundwater flow patterns at the site. Solutia requests that the Agency state what is inappropriate about using existing information to define groundwater flow patterns.

16. "Illinois EPA does not agree that 100 total samples in Dead Creek will determine a credible waste volume as a 200 foot interval is probably too great. Is sampling in CS-B necessary since it was already done at a 150 foot interval?"

Solutia proposed collecting creek sediment samples every 200 feet in a water body that is approximately 16,000 ft. long. A 150 ft. sampling interval was used by Solutia in its 1991 investigation of Creek Sector B which is approximately 2000 ft. long. Given the length of Dead Creek, Solutia believes that sediment sampling at 200 ft. intervals will provide sufficient information to determine the extent of downstream migration of site-related constituents. This extent of migration information, coupled with sediment thickness measurements and channel cross sectional area will provide sufficient information to determine volume of impacted sediments.

Solutia understood that 200 feet intervals was acceptable and requests clarification from the Agency as to how this approach is inappropriate.

18. "Why aren't PCBs and heavy metals being sampled?"

In response to a comment from USACE, Solutia streamlined the air sampling program to include only PUF sample collection. While PUF samplers can be used to collect SVOC data, they can not be used to collect heavy metals data.

Solutia requests clarification from the Agency what parameters are supposed to be included in the air sampling program.

19. "Why isn't there anything [ecological sampling] proposed in CS-F between Route 3 and the western part of the wetland CS-F flows into(see Figure 7)?

Solutia proposed ecological sampling at three locations in the Borrow Pit Lake which is part of Creek Sector F. Solutia also proposed ecological sampling in Creek Sectors B, C, D and E. Solutia believes that the samples from CS-B, C, D and E adequately represent conditions in the stream portion of the study area and that addition of a sampling station in Creek Sector F will not add substantially to the evaluation of ecological impact.

Solutia requests clarification from the Agency as to why its proposed approach is inadequate.

24. "Figure 3: This map allegedly shows the "shallow groundwater plume extent". This is misleading since there is no coverage outside of the blackened area."

Solutia based Figure 3 on Total VOC and SVOC contained in the 1998 Ecology & Environment report prepared for USEPA.

Solutia requests an explanation from the Agency as to how reliance on the 1998 E&E report to prepare the SSP can be considered misleading and how use of this information in preparing the SSP is inappropriate.